

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 14 2011

PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF AEP KENTUCKY TRANSMISSION )  
COMPANY, INC. FOR A CERTIFICATE OF PUBLIC ) CASE NO.  
CONVENIENCE AND NECESSITY PURSUANT TO ) 2011-00042  
KRS 278.020 TO PROVIDE WHOLESALE )  
TRANSMISSION SERVICE IN THE COMMONWEALTH )

ATTORNEY GENERAL'S  
MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to KRS 367.150(8), which grants him the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests, hereby moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8).

The Attorney General notes that the Commission's procedural schedule imposed a date restriction for intervention in this matter. However, the Attorney General, like all agencies in the Commonwealth, has been forced to limit the hours of his staff due to mandatory furloughs imposed by the current state government budget crisis, which prevented him from filing his petition to intervene at an earlier date. Moreover, it appears that based on the company's filing in this matter, Kentucky Power's ratepayers could well be faced with significantly higher costs if the company's request is approved. For these reasons, the Attorney General argues that any denial of his motion to

intervene would constitute a deprivation of Due Process on behalf of the citizens whom he represents.

Respectfully submitted,

JACK CONWAY  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. Mark R. Overstreet  
Stites & Harbison  
P. O. Box 634  
Frankfort, KY 40602-0634

Hon. David F. Boehm  
Boehm, Kurtz & Lowry  
36 E. 7th St.  
Ste. 1510  
Cincinnati, Ohio 45202

this 14<sup>th</sup> day of March, 2011

  
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Assistant Attorney General